

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re: MONICA ROUSSELLE,	)	No. 24 B 11595
	)	
Debtor.	)	Chapter 7
<hr/>		
MONICA ROUSSELLE,	)	
	)	
Plaintiff,	)	
	)	Judge Cassling
v.	)	
	)	No. 24 A 384
UNITED STATES DEPARTMENT OF	)	
EDUCATION,	)	
	)	
Defendant.	)	

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on May 6, 2025, at 10:00 a.m., I will appear before the Honorable Donald R. Cassling, or any judge sitting in that judge's place, **either** in courtroom 619 of the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois, **or** electronically as described below, and present the motion of the Department of Education to enter an agreed judgment order, a copy of which is attached.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by Zoom using the internet**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

**To appear by Zoom using a telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is 161 414 7941 and the passcode is 619. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of

Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

Respectfully submitted,

ANDREW S. BOUTROS  
United States Attorney

By: s/ David H. DeCelles  
\_\_\_\_\_  
DAVID H. DECELLES  
Assistant United States Attorney  
219 South Dearborn Street  
Chicago, Illinois 60604  
(312) 353-4220  
david.decelles@usdoj.gov

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re: MONICA ROUSSELLE,	)	No. 24 B 11595
	)	
Debtor.	)	Chapter 7
<hr/>		
MONICA ROUSSELLE,	)	
	)	
Plaintiff,	)	
	)	Judge Cassling
v.	)	
	)	No. 24 A 384
UNITED STATES DEPARTMENT OF	)	
EDUCATION,	)	
	)	
Defendant.	)	

**DEPARTMENT OF EDUCATION'S  
MOTION TO ENTER AGREED JUDGMENT ORDER**

Defendant United States Department of Education, by its attorney, Andrew S. Boutros, United States Attorney for the Northern District of Illinois, moves to enter the attached agreed judgment order and, in support, states as follows:

1. Plaintiff Monica Rousselle filed the above captioned adversary proceeding to determine the dischargeability of student loan debt based on undue hardship pursuant to 11 U.S.C. § 523(a)(8).
2. The Department of Education and Rousselle entered into the attached stipulation (Stipulation), in which the parties stipulated that excepting the Department Loans (as that term is defined in the Stipulation) from discharge would impose an undue hardship on Rousselle.
3. Accordingly, with Rousselle's agreement, the Department of Education asks that the court enter judgment in favor of Rousselle, declaring that the Department Loans are dischargeable under § 523(a)(8) and discharged under the discharge order entered in the above captioned bankruptcy case.

4. Entry of the agreed judgment order will resolve this adversary proceeding.

WHEREFORE, the Department of Education requests that the court enter the attached agreed judgment order.

Respectfully submitted,

ANDREW S. BOUTROS  
United States Attorney

By: s/ David H. DeCelles  
DAVID H. DECELLES  
Assistant United States Attorney  
219 South Dearborn Street  
Chicago, Illinois 60604  
(312) 353-4220  
david.decelles@usdoj.gov

**Certificate of Service**

The undersigned Assistant United States Attorney hereby certifies that in accordance with Fed. R. Civ. P. 5, L.R. 7005-1, and the Administrative Procedures for the Case Management/Electronic Case Filing System, the following documents:

**NOTICE OF MOTION**

**DEPARTMENT OF EDUCATION'S  
MOTION TO ENTER AGREED JUDGMENT ORDER**

were served on April 17, 2025, through the court's ECF system on the following ECF filer:

David H. Cutler  
Cutler & Associates, Ltd.  
4131 Main St.  
Skokie, IL 60076  
cutlerfilings@gmail.com

s/ David H. DeCelles  
DAVID H. DECELLES  
Assistant United States Attorney  
219 South Dearborn Street  
Chicago, Illinois 60604  
(312) 353-4220  
david.decelles@usdoj.gov